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November 10, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 98-121

Dear Ms. Salas:

On November 9, 1999 Al Varner, Daonne Caldwell, Keith Milner and I, representing BellSouth, met with staff of the Common Carrier Bureau's Competitive Pricing Division. Division staff attending the meeting included Richard Lerner, Jennifer McKee, Neil Fried, and Douglas Slotten. During the meeting we discussed topics related to BellSouth's showing in a 271 application of compliance with the requirements of the Telecom Act and the Commission's rules governing pricing of unbundled network elements (UNEs). Those topics included a survey discussion of digital loop carrier functionality and types; provision of unbundled loops and loop/port combinations when an end user is served through a integrated digital loop carrier system; and the assumptions underlying BellSouth's cost analysis for provision of unbundled loops and loop/port combinations. Attachment 1 formed the basis for BellSouth's presentation on digital loop carrier technology and the provisioning of unbundled loops for CLECs desiring to serve end users whom BellSouth currently serves using a digital loop carrier system. Using Attachment 2, Daonne Caldwell explained how BellSouth developed its cost studies to support the prices it proposed for unbundled loops and loop/port combinations.

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In accordance with Section 1.1206, I am filing two copies of this notice in the proceeding identified above and ask that this notice be associated with that proceeding's record.

Sincerely,

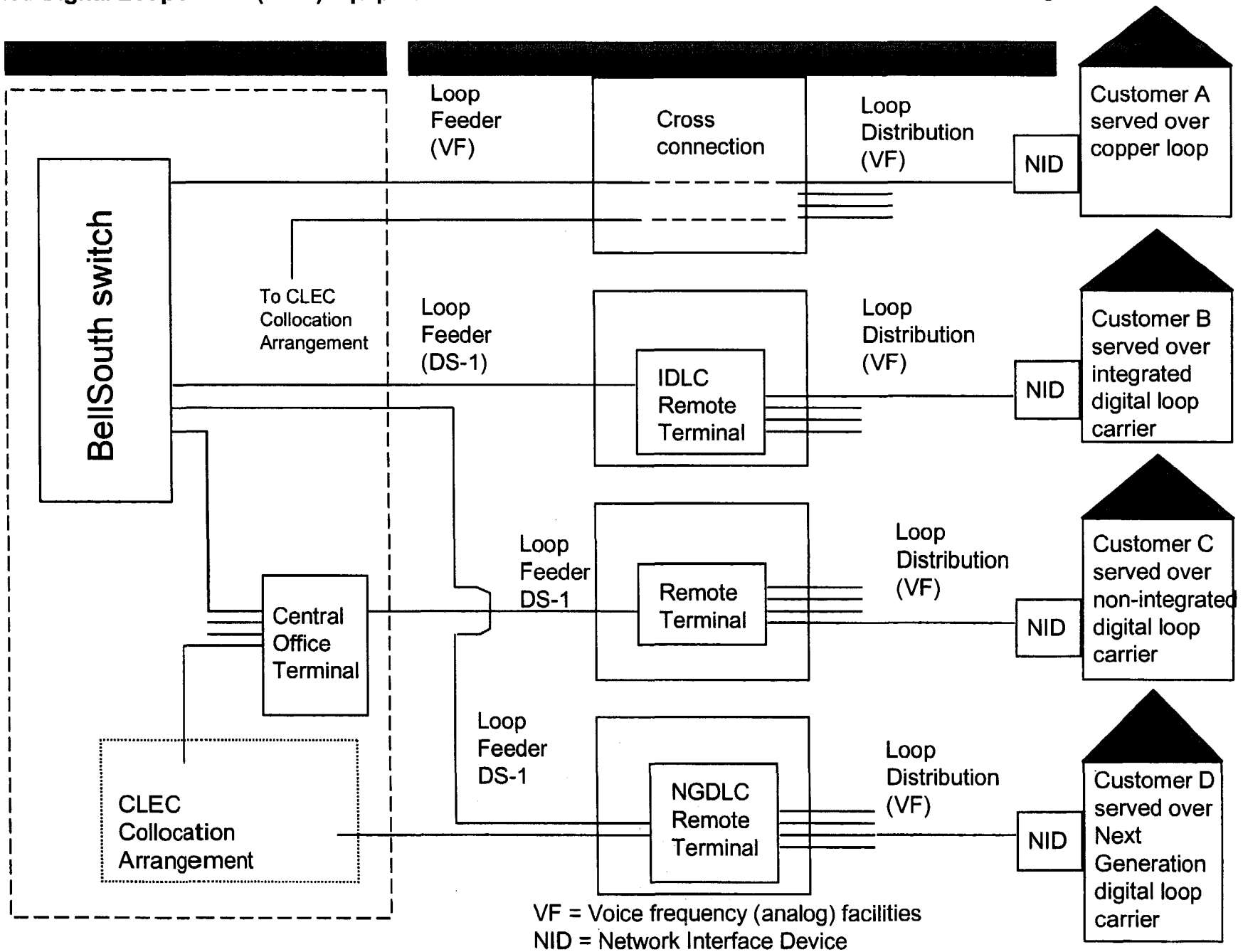
Kathleen B. Levitz

Attachment

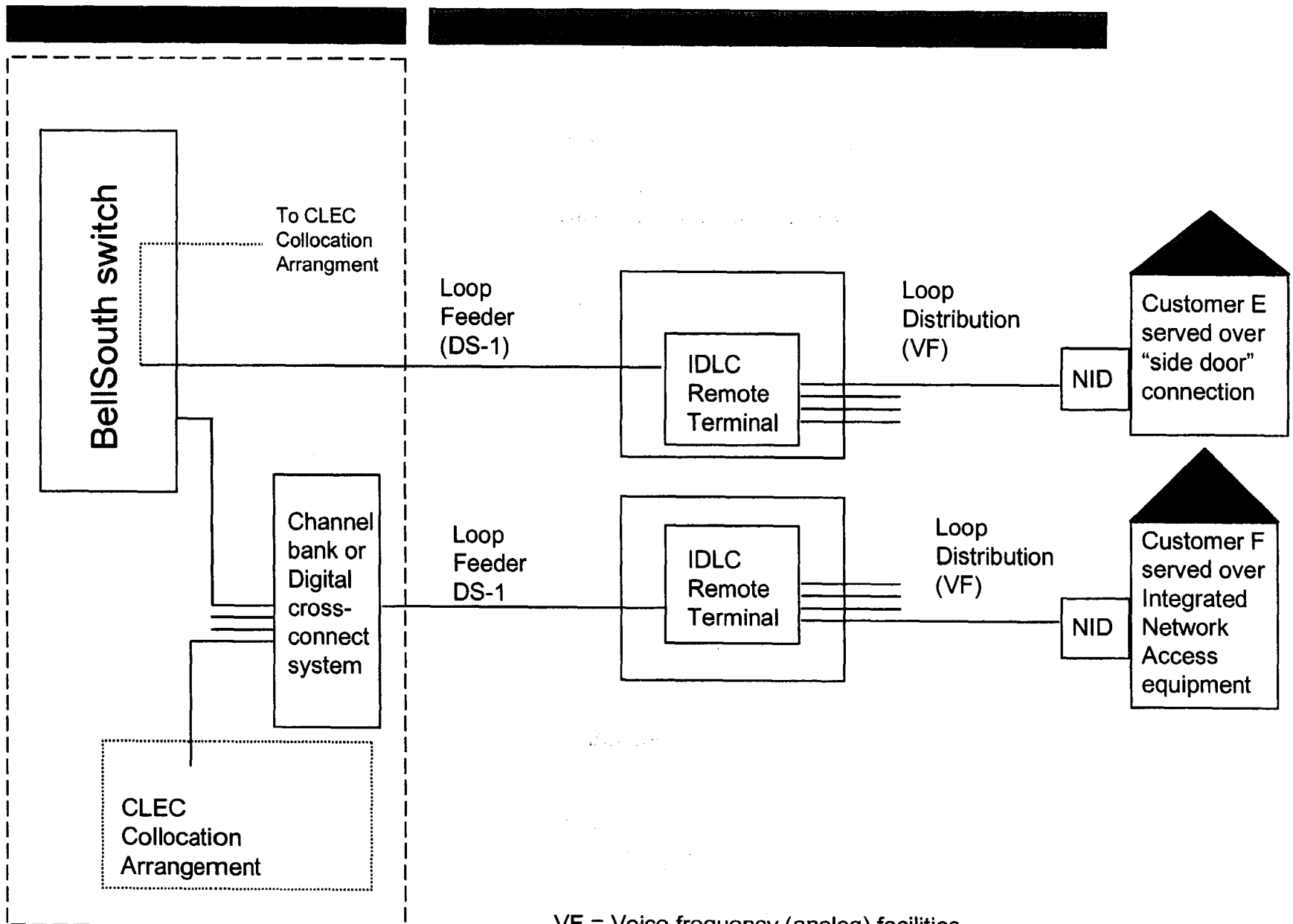
cc: Richard Lerner (w/o attachment)
Jennifer McKee (w/o attachment)
Neil Fried (w/o attachment)
Douglas Slotten (w/o attachment)

Unbunded loops served via
Integrated Digital LoopCarrier (IDLC) equipment

ATTACHMENT 1



Unbunded loops served via
Integrated Digital LoopCarrier (IDLC) equipment



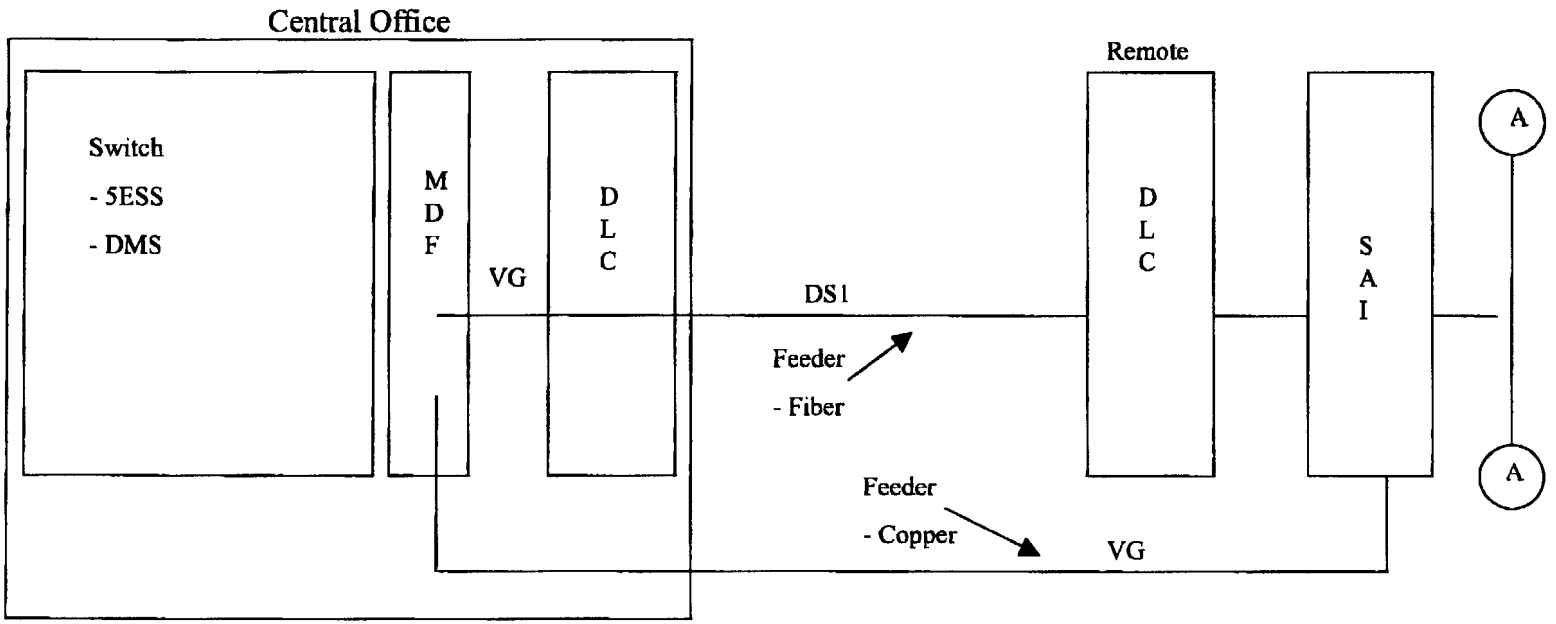
VF = Voice frequency (analog) facilities
NID = Network Interface Device

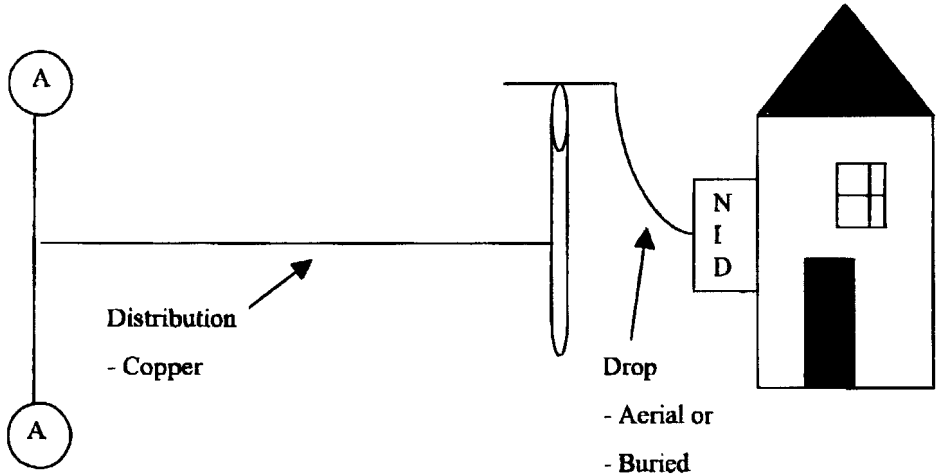
To date, BellSouth has identified six technically feasible methods by which loops served by Integrated Digital Loop Carrier (IDLC) may be provided on an unbundled basis. All six methods may not always be available in a specific location. Briefly, the six methods are:

1. Remove the loop distribution pair from the IDLC and re-terminate the pair to either a spare metallic feeder pair (copper pair) [Customer A] or to a spare universal digital loop carrier facility in the feeder route or Carrier Serving Area (CSA) [Customer C]. For two-wire ISDN loops, the universal digital loop carrier facilities may be made available through the use of Conklin BRITEmux or Fitel-PMX 8uMux equipment.
2. Remove the loop distribution pair from the IDLC and re-terminate the pair to utilize spare capacity of existing Integrated Network Access (INA) systems or other existing IDLC that is terminated on a digital cross-connection system (DCS) equipment [Customer F]. This will allow the unbundled loop channel to be routed to a channel bank where it can be de-multiplexed for delivery to the requesting CLEC or for termination in a Digital Loop Carrier (DLC) channel bank for concentration.
3. Utilize switch functionality referred to as "side-door/hairpin" capabilities if any existing IDLC is terminated on a peripheral with these capabilities [Customer E]. In essence, this method requires the loop to remain terminated directly into the switch and the "side-door/hairpin" capabilities allow the loop to be provided individually to the requesting CLEC. This method does, however, require that the loop be routed through the BellSouth switch (thus consuming switch resources) before being provided to the requesting CLEC.
4. If a given IDLC system is not served by a switch peripheral that is capable of "side-door/hairpin" functionality, move the IDLC system to switch peripheral equipment that is "side-door/hairpin" capable [Customer E].
5. Install and activate new UDLC facilities [Customer C] or Next Generation Digital Loop Carrier (NGDLC) facilities [Customer D] and move the requested loop from the IDLC to the new facilities. In the case of UDLC, if growth will trigger activation of additional capacity within two years, activate new UDLC capacity to the distribution area. In the case of NGDLC, if channel banks are available for growth in the CSA, activate NGDLC unless the DLC enclosure is a cabinet already wired for older DLC systems.
6. Convert some existing IDLC capacity to UDLC [Customer C]. If growth will not trigger additional capacity within two years, convert some existing IDLC capacity to UDLC.

ATTACHMENT 2

Cost Study Loop Designs





MDF - Main Distribution Frame

DLC - Digital Loop Carrier

SAI - Serving Area Interface

NID - Network Interface Device